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Mr. Mark D. Friedrichs
PI-40
Office of Policy and International Affairs
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Attention: RIN No. 1901-AB11

DOE 1605(b) Interim Final Revised General Guidelines and Draft Technical Guidelines

Dear Mr. Friedrichs,

The American Petroleum Institute (API) appreciates the opportunity to offer comments to the US Department of Energy (US DOE) on the Interim Final Revised General Guidelines and Draft Technical Guidelines of March 24th in FR Vol. 70, No. 56, p.15169.

API represents more than 400 member companies involved in all aspects of the oil and natural gas industry, including exploration, production, transportation, refining and marketing. API has been an active participant in the evolving process to enhance the DOE 1605(b) Voluntary Greenhouse Gas (GHG) Reporting Program and also participated and provided initial comments during the public workshops held April 26th & 27th. API also intends to comment further on DOE's Energy Information Administration draft forms and instructions to implement these General and Technical Guidelines.

API appreciates the significant effort expended by the DOE and the entire interagency task force in developing this enhanced voluntary reporting program. The attached API comments are provided in an attempt to help improve the usefulness of the guidance, while not overburdening companies and other entities that would like to report GHG emissions and register emission reductions.

Our detailed comments are attached to this letter.

If you have questions on any aspect of our comments or would like further explanations, please feel free to contact me at the address, e-mail or number above.

Sincerely,
Karin Ritter

Attachment